

EXHIBIT NO. 2

WILLIAM OMAR CASTILLO MIRANDA
DECEMBER 03, 2024

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D.S., a minor by and through his guardian ad litem Elsa Acosta, individually and as successor-in-interest to William Salgado; C.S., a minor by and through his guardian ad litem Elsa Acosta, individually and as successor-in-interest to William Salgado; J.S., a minor by and through her guardian ad litem Elsa Acosta, individually and as successor-in-interest to William Salgado; M.S., a minor by and through her guardian ad litem Elsa Acosta, individually and as successor-in-interest to William Salgado,

Plaintiffs,

vs.

CITY OF HUNTINGTON PARK; NICK NICHOLS; RENE REZA; MATTHEW RINCON; APRIL WHEELER; and DOES 5 through 10, inclusive,

Defendants.

Case No. 2:23-cv-09412
CBM (AGR)
(Consolidated Case No. 2:24-cv-04898 CBM (AGR))
Assigned to:
District Judge: Consuelo B. Marshall
Magistrate Judge: Alicia G. Rosenberg
Remote Deposition of:
WILLIAM OSMAR CASTILLO MIRANDA
(Noticed for William Omar Castillo Miranda)
Filed on Behalf of the Defendants
Counsel of Record for This Party:
Roger A. Colvin, Esq.
Christy M. Garcia Esq.
ALVAREZ-GLASMAN & COLVIN
13181 Crossroads Pkwy. N.
Suite 400
West Tower
City of Industry,
California 91746

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WILLIAM OMAR CASTILLO MIRANDA
DECEMBER 03, 2024

JOB NO. 1318517

1 REMOTE DEPOSITION OF WILLIAM OSMAR
2 CASTILLO MIRANDA,
3 a Witness herein, called by the Defendants for
4 examination, taken pursuant to the Federal
5 Rules of Civil Procedure, by and before
6 Alexander Schaffer, a Professional Court
7 Reporter and Notary Public, by virtual
8 teleconference, on Tuesday, December 3, 2024,
9 commencing at 10:00 a.m. PST.

10 COUNSEL PRESENT:

11 On behalf of the Plaintiffs:

12 BENJAMIN LEVINE, ESQ.
13 Law Offices of Dale K. Galipo
14 21800 Burbank Boulevard
Suite 310
Woodland Hills, California 91367
Blevine@galipolaw.com

15 CHRISTOPHER L. HOLM, ESQ.
16 Carrazco Law, APC
17 18301 Irvine Boulevard
Tustin, California 92780
Chris@carrazcolawapc.com

18 On behalf of the Defendants:

19 ROGER A. COLVIN, ESQ.
20 Alvarez-Glasman & Colvin
13181 Crossroads Parkway North
Suite 400
West Tower
21 City of Industry, California 91746
Rcolvin@agclawfirm.com

22 Also Present:

23 GIULIANA MOLINARI, Court-certified interpreter
24

25 - - -

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I N D E X

EXAMINATIONS

WITNESS:

WILLIAM OSMAR CASTILLO MIRANDA

Examination by ATTORNEY COLVIN..... 5

EXHIBITS MARKED

EXHIBIT NO.	DESCRIPTION	PAGE
Defense	Death certificate	42
Exhibit A		

- - -

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1 P R O C E E D I N G S

2 THE REPORTER: The attorneys
3 participating in this deposition acknowledge
4 that I am not physically present in the
5 deposition room and that I will be reporting
6 this deposition remotely. They further
7 acknowledge that I will administer the oath to
8 the witness remotely.

9 The parties and their counsel
10 consent to this arrangement and waive any
11 objections to this manner of reporting. Please
12 indicate your agreement by stating your name
13 and your agreement on the record.

14 ATTORNEY COLVIN: Roger
15 Colvin, for the Defendants, and I agree.

16 ATTORNEY HOLM: Christopher
17 Holm, for the Plaintiffs. I agree.

18 ATTORNEY LEVINE: Benjamin
19 Levine, for the Salgado Plaintiffs, I agree.

20 THE INTERPRETER: My name is
21 Giuliana Molinari, and my Certification No. is
22 301448.

23 And the Interpreter's Oath was
24 administered to me, and I presented my
25 Interpreter Badge with my photo ID to all

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1 parties in this proceeding.

2 (A brief discussion was held off the record.)

3 WILLIAM OSMAR CASTILLO MIRANDA, a
4 Witness herein, having been first duly sworn,
5 was examined and testified through an
6 interpreter, also duly sworn, as follows:

7 EXAMINATION

8 BY ATTORNEY COLVIN:

9 Q. Good morning, Mr. Castillo Miranda.

10 A. Good morning.

11 Q. Do you prefer to be called
12 Mr. Castillo or Mr. Miranda?

13 A. Castillo.

14 Q. Okay. And could you please state
15 your full name for the record?

16 A. William Osmar Castillo Miranda.

17 Q. Thank you. Have you ever been known
18 by any other name in your lifetime?

19 A. No.

20 Q. And what is your date of birth,
21 please?

22 A. May 9, 1968.

23 Q. Mr. Castillo, my name is Roger
24 Colvin, and I represent the City and the
25 Officers in this lawsuit. We're here to take

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1 A. My wife.

2 Q. And what is her full name, please?

3 A. Eugenia Guadalupe Espinoza.

4 Q. Did your neighbor tell you where she
5 was located when she took the video?

6 A. No.

7 Q. Did you ever talk to her about the
8 incident and the shooting of your son after
9 this initial conversation?

10 A. No.

11 Q. Have you spoken to any of your
12 neighbors at any time after the shooting, up
13 until today, other than her?

14 A. No.

15 Q. Are you aware of any person,
16 regardless of being a neighbor, that you spoke
17 to that told you they witnessed the shooting?

18 A. No.

19 Q. Of your family members that were
20 there that day of the incident, to your
21 knowledge, which of your family members
22 actually witnessed the shooting of your son, in
23 other words, saw your son being shot?

24 THE INTERPRETER: Can the
25 Interpreter have the question repeated, please?

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1 BY ATTORNEY COLVIN:

2 Q. Other than your neighbors -- I'm
3 talking about your family members that were at
4 home that night when your son was shot. Which
5 one of those family members, if any, do you
6 know saw the police shoot your son?

7 A. My wife, my two kids, and myself.

8 Q. That's it?

9 A. Yes.

10 Q. Do you know if the neighbor who took
11 the -- who gave you the video of the incident
12 is married, and if so, do you know her
13 husband's name?

14 A. She lives with someone, but I don't
15 know.

16 Q. Okay. And how long have you been
17 neighbors?

18 A. About 12 years, I think.

19 Q. And is it your testimony that you
20 don't know her last name? Is that true?

21 A. No.

22 Q. Okay. Where do you currently
23 reside?

24 A. 6315 Malabar Street, Apartment C,
25 Huntington Park, Los Angeles, California.

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1 you know what type of material it is made of?

2 Is it wood, steel? Do you know?

3 A. The one outside is metal; the one
4 inside is wood.

5 Q. The metal, the outside, you mean
6 it's like a screen door?

7 A. Yes.

8 Q. How much is the rent, currently?

9 A. \$1,331.

10 Q. I'm going to go over a few names
11 with you, and I'm going to ask if you know
12 their relationships. First would be William
13 Rene Salgado Miranda: What was his
14 relationship to you before his death?

15 A. My son.

16 Q. Were you the biological father of
17 William Miranda?

18 A. Yes.

19 Q. If I call your son William, will you
20 understand I mean, each and every time, William
21 Rene Salgado Miranda?

22 A. Yes.

23 Q. And what was William's date of
24 birth?

25 A. If I'm not mistaken, it was

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1 November 7, 1991.

2 Q. And where was William born?

3 A. Nicaragua.

4 Q. Do you know the name of the hospital
5 where he was born?

6 A. I don't recall because it's no
7 longer there.

8 Q. Were you present at his birth?

9 A. Yes.

10 Q. To your knowledge, were you named as
11 the biological father on the birth certificate?

12 A. On the original one, yes. But
13 William's mom left him when he was 40 days old,
14 and my mom and my stepdad helped me raise him.

15 Q. Thank you. Do you know an
16 individual by the name of Inocente Salgado
17 Peralta?

18 A. Yes. That was my mom's husband.

19 ATTORNEY COLVIN: I don't
20 know, Mr. Reporter, if you received the
21 documents yet --

22 (A brief discussion was held off the record.)

23 BY ATTORNEY COLVIN:

24 Q. Who is Juana Maria Miranda Jimenez,
25 and what's her relationship to William, if any?

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1 THE INTERPRETER: I'm sorry.

2 Again, the name?

3 BY ATTORNEY COLVIN:

4 Q. Juana Maria Miranda Jimenez?

5 A. That's my mom and William's grandma.

6 Q. To your knowledge, did she adopt

7 William?

8 A. Yes.

9 Q. When did the adoption occur, if you
10 know?

11 A. When he was about two years old.

12 Q. And to your knowledge, where was he
13 adopted, what city?

14 A. Chinandega, Nicaragua. Chinandega.

15 Q. Was this, to your knowledge, a legal
16 adoption?

17 ATTORNEY HOLM: Calls for
18 speculation. You can answer.

19 ATTORNEY LEVINE: It calls for
20 a legal opinion too.

21 ATTORNEY HOLM: Join.

22 THE WITNESS: Not legally, or
23 with a notary, or with signed papers. But my
24 mom told me, "To help you out, why don't we
25 give him Chente's last name?" -- my mom's

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1 husband -- and so I went off and started
2 working to help them out.

3 BY ATTORNEY COLVIN:

4 Q. You say, "Help them out."
5 Who's "them"?

6 A. My family, financially.

7 Q. So do you have any legal papers in
8 your possession regarding this adoption?

9 A. All those documents, the birth
10 certificate and everything, I have at home.

11 Q. Including the adoption papers?

12 A. Yes. I understand that that's where
13 my stepdad's last name appears.

14 Q. And your stepdad's last name, again,
15 is what?

16 A. Salgado Peralta.

17 Q. And Eugenia Guadalupe Espinoza, what
18 is her relationship to you?

19 A. That's my wife.

20 Q. And what's your date of marriage to
21 her?

22 A. In 2007.

23 Q. Where did you get married?

24 A. Nicaragua.

25 Q. Did you receive a marriage

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1 A. I don't know what period of time
2 William lived with Elsa in Watts.

3 Q. Did William live with you at your
4 Malabar address for the entire year of 2022,
5 until his death on October 30?

6 A. Yes.

7 Q. To your knowledge, did William
8 reside with you at your Malabar address for the
9 year 2021?

10 A. Yes.

11 Q. And to your knowledge, did William
12 reside with you at your Malabar address in the
13 year 2020?

14 A. No.

15 Q. To your knowledge, where did he live
16 in 2020?

17 A. Not perfectly. Because he would
18 stay at his mother-in-law's, at the house they
19 had rented.

20 Q. Do you know what month he stayed at
21 the house he rented in 2020?

22 A. No.

23 Q. Do you know what month William lived
24 at Elsa's mother's house in 2020?

25 A. No.

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1 A. No, not exactly.

2 Q. Do you know if he was living with
3 Elsa Acosta and his four kids at the Indiana
4 Street address?

5 A. Yes.

6 Q. How do you know that?

7 A. I visited them.

8 Q. And you don't know what year he was
9 residing at that address?

10 A. I don't recall.

11 Q. When did William move in with you
12 and your wife and your children at Malabar?

13 A. At no time. It was only William.

14 Q. Okay. When did William first move
15 in with you and your wife and children at
16 Malabar?

17 ATTORNEY HOLM: Vague as
18 phrased. Vague as to time. You can answer.

19 THE WITNESS: At no time did
20 Elsa and the kids move in. It was only
21 William, alone, in my apartment.

22 BY ATTORNEY COLVIN:

23 Q. I understand. But the question is:

24 When did William, alone, move into
25 your apartment before October 30, 2022?

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1 A. I don't recall the month.

2 Q. Do you recall the year?

3 A. '21.

4 Q. Do you know why he moved in with you
5 back in 2021?

6 A. No, because he was very quiet.

7 Q. Is that the reason why he moved into
8 your Malabar apartment back in 2021, because he
9 was quiet?

10 ATTORNEY LEVINE: Calls for
11 speculation.

12 THE WITNESS: He asked me all
13 of a sudden, Dad, let me stay here.

14 And I asked him why. He said, "A
15 small problem, that's all."

16 BY ATTORNEY COLVIN:

17 Q. Did he tell you what the "small
18 problem" was?

19 A. No.

20 Q. To your knowledge, did it have
21 anything to do with Elsa Acosta?

22 ATTORNEY LEVINE: Calls for
23 speculation.

24 ATTORNEY HOLM: Join.

25 THE WITNESS: No.

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1 Q. So you went to the back of the
2 apartment and you had this conversation with
3 your son. Was it Osmar, you said?

4 A. Yes.

5 Q. And was it just you and Osmar, at
6 this time, having the conversation?

7 A. My wife was there; Oscar; and then
8 William came over, and then we had a cigarette
9 with William.

10 Q. Where -- at what location did you
11 have the cigarette with William?

12 A. The alley, the back alley.

13 Q. And while you were having a
14 cigarette with William, who was there at that
15 time?

16 A. My wife, Osmar, William, and myself.
17 Oscar moved away a little bit
18 because of the cigarette smoke.

19 Q. After you finished the cigarettes,
20 what did you do?

21 A. I stayed there with Osmar, and
22 William came back to the backyard to keep
23 talking to his kids.

24 Q. In your opinion, was William, at
25 this point in time, acting strange or unusual?

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1 ATTORNEY LEVINE: Vague.

2 ATTORNEY HOLM: Join.

3 THE WITNESS: No. Normal.

4 ATTORNEY COLVIN: I'm sorry?

5 THE INTERPRETER: "Normal."

6 ATTORNEY COLVIN: Thank you.

7 BY ATTORNEY COLVIN:

8 Q. And what did you do next?

9 A. My wife turned to look at the area
10 where the apartment was, and she says, "Honey,
11 the police is there."

12 Q. And where were you located when she
13 had this conversation with you?

14 A. In the alley where we were smoking
15 with Osmar.

16 Q. Do you know where William was at
17 this time, when your wife told you that the
18 police were here?

19 A. Yes. He was by the stairs, talking
20 to the kids.

21 Q. On the telephone?

22 A. Yes.

23 Q. Could you see him at this point in
24 time? Could you physically see him?

25 A. William?

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1 THE INTERPRETER: Counsel,
2 there was an answer. The answer was "No."

3 ATTORNEY COLVIN: Thank you.

4 THE INTERPRETER: Sure.

5 BY ATTORNEY COLVIN:

6 Q. So after William walked backwards
7 about 50 feet, did he come to a stop that you
8 saw?

9 A. He stood there. He just stood
10 there.

11 Q. You were still on the balcony?

12 A. I was there on the balcony until
13 they killed him and took him away.

14 Q. I'm not there; I'll get there.
15 I'm at the point where he walked
16 backwards for 50 yards (sic) and came to a
17 stop; that's where I'm at now.

18 ATTORNEY HOLM: Just to
19 clarify, he didn't say "50 yards"; he said,
20 "50 feet."

21 THE WITNESS: 50 feet.

22 ATTORNEY COLVIN: Thank you.
23 My error.

24 BY ATTORNEY COLVIN:

25 Q. When William came to a stop, what

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1 interpreter, a Spanish interpreter?

2 A. She spoke Spanish.

3 Q. And did she ask you to tell her how
4 the incident occurred, from what you saw?

5 A. At no time.

6 Q. Well, what did she ask you in this
7 interview?

8 A. She said, "Don't worry about it.
9 Everything is going to be okay. We're just
10 going to take you to the police station to make
11 a statement."

12 She said that to me, and my wife,
13 and my kids.

14 Q. So did you go to the police station
15 and make a statement there?

16 A. Late.

17 They took us at about 11:00 p.m.

18 Q. The same night?

19 A. That same night.

20 Q. Do you know what police station you
21 were taken to?

22 A. Huntington Park.

23 Q. And did you have an interview
24 conducted there, in the Huntington Park police
25 station?

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1 A. Yes.

2 The detective only asked me, "Did
3 you see what happened to William?" And I said,
4 "Of course, I was on the balcony."

5 Q. Do you know how long this interview
6 took?

7 A. With me, no more than one minute,
8 because I like telling the truth.

9 The detective told me, "I'm sorry."

10 I asked him, "Have you ever had a
11 child killed?"

12 He said no. And so I said, "How are
13 you going to be sorry, then?"

14 Q. How long did the interview take,
15 from start to finish?

16 A. With me, about one minute.

17 Q. Okay. And when you were having this
18 interview conducted, did the person taking the
19 interview speak Spanish, or was there an
20 interpreter there who spoke Spanish?

21 A. They spoke Spanish.

22 ATTORNEY HOLM: We've been
23 going for a little over an hour here, Roger.
24 Is it okay if --

25 ATTORNEY COLVIN: Let me

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1 arrive to your son's body after he was shot,
2 how much time elapsed?

3 A. About two minutes.

4 Q. What did you see the paramedics or
5 the Fire Department do?

6 A. The paramedics only got there, put
7 him on the gurney, and rushed out with him.

8 Q. What did you see the officers do
9 after the paramedics took William's body away
10 from the scene?

11 A. They put him in the ambulance.

12 Q. Did the police officers?

13 A. No.

14 The paramedics took him away in the
15 ambulance, and the police officers stayed
16 there, waiting, so that we wouldn't come down
17 from the balcony.

18 Q. Did you ever hear William mention
19 suicide to you at any time in your relationship
20 with him?

21 A. No.

22 Q. Do you know a person by the name of
23 Carolina or Carolina Acosta?

24 A. Yes.

25 Elsa Carolina Acosta, that's his

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1 COMMONWEALTH OF PENNSYLVANIA)
2)
3 COUNTY OF DELAWARE)

4 CERTIFICATE

5 I, Alexander Schaffer, a Notary Public in and
6 for the Commonwealth of Pennsylvania, do hereby
7 certify that the witness, WILLIAM CASTILLO
8 MIRANDA, was by me first duly sworn to testify
9 the truth, the whole truth, and nothing but the
10 truth; that the foregoing deposition was taken
11 at the time and place stated herein; and that
12 the said deposition was recorded
13 stenographically by me and then reduced to
14 typewriting under my direction, and constitutes
15 a true record of the testimony given by said
16 witness.

17 I further certify that I am not a relative,
18 employee or attorney of any of the parties, or
19 a relative or employee of either counsel, and
20 that I am in no way interested directly or
21 indirectly in this action.

22 IN WITNESS WHEREOF, I have hereunto set my
23 hand and affixed my seal of office this 3rd day
24 of December 2024.

25 /S/ Alexander Schaffer
Alexander Schaffer
Alexander Schaffer, Notary Public
Court Reporter
Delaware County
My Commission Expires 11/21/2027
Commission No. 1440904